

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ISHAN WAHI, NIKHIL WAHI, and SAMEER
RAMANI,

Defendants.

Civil Action No. 2:22-cv-1009

MOTION FOR ENTRY OF
DEFAULT AS TO DEFENDANT
SAMEER RAMANI

NOTE ON MOTION
CALENDAR: OCTOBER 19,
2023

Pursuant to Fed. R. Civ. P. 55(a) and L.R. 55.1, Plaintiff Securities and Exchange Commission (“SEC”) respectfully requests entry of default as to Defendant Sameer Ramani.

I. INTRODUCTION

Rule 55(a) directs the Clerk of Court to enter a default when the party “against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise[.]” Fed. R. Civ. P. 55(a). Here, the SEC filed the Complaint in this matter on July 21, 2022, and an Amended Complaint on December 22, 2022. ECF Nos. 1, 27. As demonstrated below, Defendant Ramani was properly served with the Summons, Complaint, and Amended Complaint by email on May 26, 2023. Decl. of Peter Lallas, ¶¶ 3, 4; ECF Nos. 106, 112. To date, despite being properly served, Defendant Ramani has not filed any responsive pleading or other defense to the Amended Complaint.

II. FACTUAL BACKGROUND

On July 21, 2022, the SEC filed its Complaint in this matter. ECF No. 1. On December 22, 2022, the SEC filed an Amended Complaint. ECF No. 27.

On December 22, 2022, the SEC filed a Motion for Alternative Service on Defendant Sameer Ramani. ECF No. 28.

1 On May 22, 2023, this Court issued an Order authorizing service by alternative means on
2 Defendant Ramani, including by email and WhatsApp. ECF No. 106.

3 On May 26, 2023, the SEC effected service on Defendant Ramani by emailing the
4 Complaint, Amended Complaint, and Summons to the email addresses contained in the Court's
5 May 22, 2023 Order. Decl. of Peter Lallas, ¶ 4; ECF No. 112.

6 **III. CONCLUSION**

7 As demonstrated above, Defendant Ramani was properly served on May 26, 2023. As of
8 October 19, 2023, the Court's docket reflects that Defendant Ramani has not filed any pleadings or
9 other defenses to the Complaint or Amended Complaint. *See* Dkt. *SEC v. Wahi, et al.*, Case No. 22-
10 cv-01009 (W.D. Wa.). Accordingly, the SEC respectfully requests that the Clerk of Court enter
11 default against Defendant Ramani.

12 Respectfully submitted,

13 /s/ Peter Lallas

14 Daniel Maher

15 Peter Lallas

16 (Conditionally Admitted Under LR 83.1)

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